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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH TUNILLA,

Defendant.

No. 3:24-cr-00118-SLG-KFR

COUNT 1:

BANK ROBBERY

Vio. of 18 U.S.C. § 2113(a)

CRIMINAL FORFEITURE

ALLEGATION:

Vio. of 18 U.S.C. § 981(a)(1), 28  
U.S.C. § 2461(c), and Rule 32.2(a)

**INDICTMENT**

The Grand Jury charges that:

COUNT 1

On or about August 22, 2024, within the District of Alaska, the defendant, JOSEPH TUNILLA, by force, violence, and intimidation, did take from the person or presence of another money belonging to and in the care, custody, control, management, and possession

of Northrim Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

All of which is in violation of 18 U.S.C. § 2113(a).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Upon conviction of the offense charged in Count 1, the defendant, JOSEPH TUNILLA, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 2113(a), including a forfeiture money judgment equal to the value of the property.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

All pursuant to 18 U.S.C. § 981(a)(1), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the  
Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Christopher D. Schroeder  
CHRISTOPHER D. SCHROEDER  
MAC CAILLE PETURSSON  
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United States of America

s/ S. Lane Tucker  
S. LANE TUCKER  
United States Attorney  
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DATE: 10/15/24